

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS  
CORPORATION

Plaintiff,

v.

AMERICAN AIRLINES, INC., ET AL.

Defendants.

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Case No. 2:13-CV-655-JRG  
(LEAD CASE)

**Jury Trial Demanded**

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO REPLY TO DEFENDANTS SOUTHWEST AIRLINES CO. AND HAWAIIAN  
AIRLINES, INC.’S RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion”) hereby respectfully moves for an extension of time to reply to Defendants Southwest Airlines Co., (“Southwest”) and Hawaiian Airlines, Inc.’s (“Hawaiian Airlines”) Response to Motion for Preliminary Injunction filed on June 30, 2014 [Doc. No. 92] (the “Motion”). In support thereof, Plaintiff would show the Court the following:

Loyalty Conversion’s reply to the Motion is currently due on July 10, 2014. The present Motion requests an extension until and including July 17, 2014. Counsel for the parties have conferred with respect to this Motion, and counsel for Defendants have indicated Defendants are unopposed to the relief sought in this Motion. The extension is not sought for purposes of delay but so that justice may be done.

Dated: July 9, 2014

Respectfully submitted,

By: /s/ Andrew G. DiNovo

Andrew G. DiNovo  
Texas State Bar No. 00790594  
Jay D. Ellwanger  
Texas State Bar No. 24036522  
Adam G. Price  
Texas State Bar No. 24027750  
DiNovo Price Ellwanger & Hardy LLP  
7000 N. MoPac Expressway, Suite 350  
Austin, Texas 78731  
Telephone: (512) 539-2626  
Facsimile: (512) 539-2627

ATTORNEYS FOR PLAINTIFF  
LOYALTY CONVERSION SYSTEMS  
CORPORATION

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Defendants are unopposed to the foregoing motion.

/s/ Andrew G. DiNovo

Andrew G. DiNovo

### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 9th day of July 2014.

/s/ Andrew G. DiNovo

Andrew G. DiNovo